

NOV - 8 2013

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISIONCLERK, U.S. DISTRICT COURT
By *[Signature]*
Deputy4
5 FLEXIBLE INNOVATIONS LTD.,
A Texas Limited Partnership,

6 Plaintiff,

7 v.
8 IDEAMAX, EUGENE LEE, and AEKYUNG
9 LEE,
10 Defendant

11 Case No.: 4:12-CV-00856-A

12
13 DEFENDANTS' STATEMENT OF
14 COMPLIANCE WITH COURT'S ORDER
15 AND OPPOSITION TO PLAINTIFF'S
16 REPORT RE NONCOMPLIANCE WITH
17 NOTICE OF STEPS TO TAKE TO COMPLY
18 WITH COURT'S ORDERS19
20 I21 COMPLIANCE22
23 Defendants Ideamax, Eugene Lee and Aekyung Lee (collectively "Defendants") have
24 complied, or have substantially complied with the "Order of Contempt" as filed on October 9,
25 2013. Specifically, the following actions have been taken regarding this compliance:26
27 1. **Pursuant to Order of Contempt (a):** Action taken: Defendants removed the
28 phrase "Trust the original genuinely United States Patented manufacturer for
over 10 years!" from its website at www.microclean.net; see **EXHIBIT A**.
29
30 2. **Pursuant to Order of Contempt (b):** Action taken: Defendants removed the
31 phrase "OFFICIAL UNITED STATES PATENTED PRODUCT" in
32 conjunction with Defendants' microfiber screen wipe products from its website
33 at www.microclean.net; see **EXHIBIT A**.
34
35 3. **Pursuant to Order of Contempt (c):** Action taken: Defendants removed the
36 phrase "Being the patented manufacturer" in conjunction with Defendants'
37 microfiber screen wipe products by removing the phrase on the webpage from
38 its website at www.microclean.net; see **EXHIBIT B**.

4. **Pursuant to Order of Contempt filed October 9, 2013 (d):** Action taken: Defendants removed the mark “digipad” ” in conjunction with Defendants’ microfiber screen wipe products from its facebook page; see screenshot of Defendants’ Facebook page on 11/1/13 attached hereto as **EXHIBIT C**.
5. **Pursuant to Order of Contempt filed October 9, 2013 (e):** Action taken: Defendants removed the mark “digistand” ” in conjunction with Lee’s microfiber screen wipe products from its facebook page; see screenshot of Defendants’ Facebook page on 11/1/13 attached hereto as **EXHIBIT C**.

III

PLAINTIFF EXCEEDS SCOPE OF COURT ORDERS

6. Plaintiff argues in its Report, filed November 1, 2013, that all of its “items in the Notice come within the constraints of the “Agreed Order” (item 11, page 2 of 6) and then cites Exhibit “11” of its Notice, presumably as an example of noncompliance by Defendants.
7. With respect to Exhibit “11” of its Notice, Defendants have complied with the Agreed Order by eliminating the terms “Digipad” and Digistand” from its “Products”. See screenshot of Defendants’ Facebook page on 11/1/13 attached hereto as **EXHIBIT C**, which shows that these terms have been completely removed.
8. With respect to Exhibit “10” of its Notice (referred to as Exhibit “C” in Plaintiff’s Report), Defendants have complied with the Agreed Order by eliminating the verbiage “*Ideamax holds the official product patent on Microclean microfiber screen cleaners.*” See screenshot of Defendants’ Facebook page on 11/1/13 attached hereto as **EXHIBIT C**, which shows that this phrase has been completely removed. This screenshot contradicts Plaintiff’s assertion in its Report on page 2 of 6, item 8, that Defendants have failed to fully comply with the Agreed Order.

1 9. With respect to Exhibit "1" of Plaintiff's Report (referring to "E-Wallet"), the
2 small patent logo on the right side of the advertisement is there only to indicate
3 a new patent pending application relating to the E-Wallet, and has virtually
4 nothing to do with any cleaning qualities of an E-Wallet. Defendants are
5 willing to stipulate, however, to move the "patent (pending)" logo closer to the
6 E-Wallet name if the Court deems it necessary.

7 10. Defendants do not disagree that they must comply with all aspects of the
8 Agreed Order. Defendants, in fact, believe that they have already complied
9 with all aspects of the Agreed Order. Defendants respectfully contend,
10 however, that full compliance should not include relinquishing their own rights
11 under U.S. Patent No. 6,613,382, which relates to an adhesive gel enabling
12 multi-use products to adhere to matte finished phones, devices and cases.

13 11. It appears that the common thread to all of Plaintiff's points in items "a"
14 through "i" of its Report (see pages 3 to 5) refer to inferences that could be
15 made linking Defendants' patent references for adhesive qualities to the
16 cleaning qualities of its product by virtue of Defendants' product name.
17 Defendants believe that this connection is an unfair representation of its
18 advertising content, as well as of its intentions.

19 12. Defendants' product, "MicroClean", has two parts to it- a microfiber cleaning
20 cloth, and an adhesive gel. The product is a mobile microfiber adhesive screen
21 cleaner for smart phones, iphones, glasses and cameras, and its name is a
22 necessary part of its advertising.

23 13. An important selling point of Defendant's "MicroClean" product is its unique
24 ability to adhere to various electronic devices. This feature is fully protected
25 under Defendants' patent (U.S. Patent No. 6,613,382), and is mentioned in the
26 advertisements only in connection with its adhesive qualities. There are no
27 representations made, directly or indirectly, to any cleaning aspects or qualities
28 in connection with Defendants' patent. The mere fact that the "MicroClean"

1 name and the patented feature for adhesive qualities are made in the same
2 advertisement does not imply, and should not imply that one is connected to
3 the other. **EXHIBIT D** attached hereto shows that these references are in
4 connection with the adhesive gel aspect only, since Defendants have
5 previously stipulated not to relate its patent to its cleaning qualities or
6 characteristics.

7 14. Defendants believe that Plaintiff's assertions of contempt are nothing but wild
8 and reckless allegations which clearly overreach the scope of the Agreed
9 Order. Judge John McBryde has already denied these extra requests by
10 Plaintiff in previous hearings and has ordered Defendants to comply with six
11 specific items, which Defendants believe they are in full compliance with.
12 15. Defendants do not agree to the appointment of a special prosecutor since
13 Defendants have acted in good faith in complying with all Court Orders. If the
14 Court determines that Defendants need to take further action in addition to
15 actions they have already taken, however, Defendants will comply with any
16 decision of the Court forthwith.

17
18 Respectfully submitted,

19
20 /eugene lee/
21 
22 Eugene Lee, Defendant
23
24
25
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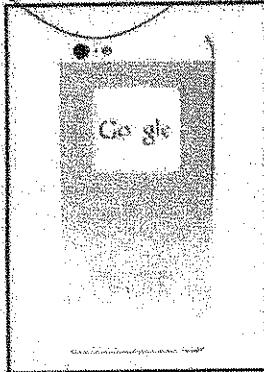
EXHIBIT A

2013 PROMO CATALOG

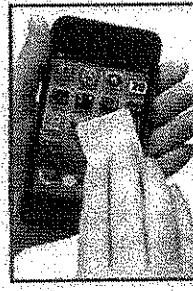
microclean.net/uploads/2013_PROMO_CATALOG_23P.jpg



Trust the original genuine United States Patented manufacturer for over 10 years!

OFFICIAL
UNITED STATES
PATENTED PRODUCT**MicroClean®**Mobile Microfiber Adhesive Screen Cleaner
for Smart Phones, iPhones, glasses, and Cameras.

PEEL



WIPE



STICK

Catalog page 2...
download is high
resolution jpgAll MicroCleans come with a FREE
Stock Packaging Card & Clear Cellophane Bag!

MicroClean #600

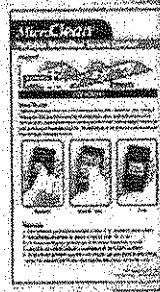
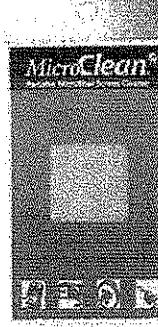
Use it on the go wherever your MOBILE device may take you!

FEATURES

- Great portable screen cleaner for smart phones, portable devices, glasses, iPods, camera lenses, etc.
- Ultra fine Microfiber material removes fingerprints, dirt, dust & makeup from screens in one swipe!
- Self-adhesive anywhere on the back of your device or device case when not in use, making it extremely portable.
- New US Patented Magic adhesive gel adheres to matte finished phones, devices and cases.
- Provides shock absorption when adhered to device
- Fully customizable product and packaging to best suite your business/marketing needs, target markets, and trends.
- Carefully developed for over ten years and originally US Patented, the revolutionary Magic adhesive gel is washable, thus resulting each MicroClean to be reusable thousands of times!
- Ultra fine Microfiber material is guaranteed not to scratch any of the recommended cleaning surfaces.
- If the Magic adhesive gel gets dusty or dirty, simply wipe it with a wet towel and the MicroClean will stick and appear like new.
- Our high frequency heat sealing and advanced production methods prevent MicroCleans from fraying and guarantee this highest durable product available on the market!

For custom packaging information, please see last page!

New Magstic Gel NOW sticks to matte & rubber finish phones & cases!

FRONT BACK
For Custom Card Information please see last page!

MicroClean #600 Pricing Per Unit

	500	1,000	2,500	5,000	10,000
S1-R1-C1	\$1.20	\$1.10	\$1.09	\$0.99	\$0.89
S2-R2-C2	\$1.40	\$1.20	\$1.20	\$1.10	\$1.00
S3-R3-C3	\$1.50	\$1.40	\$1.30	\$1.20	\$1.10
S4-R4-C4	\$1.60	\$1.50	\$1.40	\$1.30	\$1.20

Background: 1 Spot Color 2 Spot Colors 3 Spot Colors 4 Color Process

Setup Charge FREE \$35 \$70 \$100 \$100

*Pricing includes all run, PMS color matching & virtual proof charges.

MicroClean & MicroClean Max Template Sizes

S		R		C	
S1	1.0" x 1.1"	R1	1.3" x 0.8"	C1	1.0" x 1.1"
S2	1.2" x 1.3"	R2	1.6" x 1.2"	C2	1.3" x 1.2"
S3	1.5" x 1.3"	R3	1.8" x 1.2"	C3	1.7" x 1.3"
S4	1.8" x 1.3"	R4	2.4" x 1.6"	C4	1.8" x 1.8"

1-6

9

For Custom Card & Production Information please see last page!

"BEFORE"

IdeaMax

SPECIALIZING IN PORTABLE MICROFIBER & REVOLUTIONARY ACCESSORIES FOR SMART PHONES, IPHONES, IPADS, TABLETS, LAPTOPS, KINDLES, ETC!

ASI #62135 PPAI #197773 SAGE #63560

home page

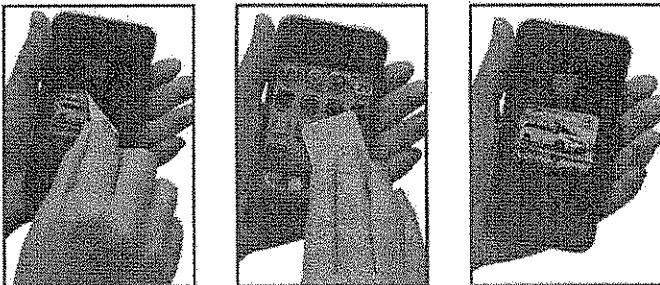
microclean
 microclean max
 micropad
 e-wallet
 r-guard
 microstand
 microstand desk
 e-stylus
 e-stylus microclean
 microcloth
 non-slip dash pad
 iphone skin
 custom card & packaging
 shipping & production
 template file downloads

MicroClean #600 A NEW'S REVOLUTIONARY PRODUCT TO PROMOTE YOUR BUSINESS, COMPANY, SERVICE OR PRODUCT!

NEW SIZES & SHAPES!

MicroClean®

Portable Microfiber Adhesive Screen Cleaner for Smart Phones, iPhones, Glasses, Cameras, etc.



PEEL WIPE STICK

Use it on the go wherever your MOBILE device may take you!

FEATURES

- Great portable screen cleaner for Smart phones, portable devices, glasses, books, cameras, etc., etc.
- Ultramicro Microfiber material removes fingerprints, dust, dust & makeup from screens in ONE SWIPE!
- Peel, clean & re-use on the back of your device or device case when not in use making it extremely portable!
- New, no scratches, doesn't damage your screen to make trusted phones, devices and cases.
- Provides shock protection when adhered to device.
- Fully customizable product and packaging to best suite your business/marketing needs, target markets, and trends!
- Comes with adhesive for cases, phones and generally is designed for use with Magistic adhesive gel is available that allows each MicroClean to be reusable thousands of times.
- Ultrathin microfiber material is guaranteed not to scratch any of the recommended cleaning surfaces.
- The MicroClean adhesive gel cuts like butter, simply wipe it with a wet towel and the MicroClean will stick and appear like new!
- Our high quality (near military) and advanced production methods prevents MicroClean from fraying and guarantees the highest quality product available on the market.

New Magistic Gel NOW sticks to matte & rubber finish phones & cases!



MicroClean & MicroClean Max Template Sizes

S	R	C
S1 1.1" x 1.1"	R1 1.3" x 0.8"	C1 1.1" x 1.1"
S2 1.3" x 1.3"	R2 1.6" x 1.2"	C2 1.3" x 1.3"
S3 1.5" x 1.5"	R3 2.0" x 1.2"	C3 1.5" x 1.5"
S4 1.8" x 1.8"	R4 2.4" x 1.6"	C4 1.8" x 1.8"
S5 2.0" x 2.0"	R5 2.75" x 1.6"	S5 2.0" x 2.0"

Custom Shapes & Sizes Available! Please contact us for full details!

MicroClean #600 Pricing Per Unit

	\$600	\$500	\$400	\$300	\$200
S1/R1/C1	\$1.10	\$1.20	\$1.15	\$1.00	\$0.90
S2/R2/C2	\$1.57	\$1.40	\$1.30	\$1.20	\$1.10
S3/R3/C3	\$1.87	\$1.50	\$1.40	\$1.30	\$1.20
S4/R4/C4	\$1.72	\$1.50	\$1.40	\$1.40	\$1.30
S5/R5/C5	\$1.87	\$1.70	\$1.60	\$1.50	\$1.40

(SC) (SV)

Background	1 Spot Color	2 Spot Colors	3 Spot Colors	4 Color Process	
Setup Charge	FREE	\$50	\$70	\$100	\$150

*Pricing includes all run, PMS color matching & virtual proof charges

All MicroCleans come with a FREE 2" x 3.5" Stock Packaging Card & Clear Cellophane Bag!

Content copyright 2013. microclean.net. All rights reserved.



EXHIBIT B

Home Page

← → × microclean.net

microclean.net
homepage

IdeaMax

SPECIALIZING IN PORTABLE MICROFIBER & REVOLUTIONARY ACCESSORIES FOR SMART PHONES, IPHONES, IPADS, TABLETS, LAPTOPS, KINDLES, ETC!

ASI #62135 PPAI #197773 SAGE #63560

home page

home page

microclean

microclean max

micropad

e-wallet

r-guard

microstand

microstand desk

e-stylus

e-stylus microclean

microcloth

non-slip dash pad

iphone skin

custom card & packaging

shipping & production

download 2013 catalog

template file downloads

MAKE YOUR VISION COME TO LIFE

In a world where instant visual recognition is demanded in all realms of society, having a few electronic accessories that can catch the attention of the public eye. With the consumers evolving technology advances of the electronics industry, the market needs for electronic accessories have greatly expanded.

With today's smart and digital technology needs, IdeaMax offers a way for you to not only increase the ultimate levels of value your business marketing to the next level, but also to increase the overall levels of revenue and profit.

What accessories have you seen recently that are catching the eye of consumers? Products that are not only visually appealing, but also have a high quality and durability diversity, but are also unique and different from the rest.

IdeaMax offers a wide range of products, from the latest accessories to the most unique and innovative items.

With IdeaMax, you can expect to create a stronger impact on your business with the best digital accessories in the highest quality possible.

Our products are revolutionizing the market, and are unique products in the industry, and have been the best in production. This product is the most highly requested, and each year we surpass the previous year in our sales.

If you look at all that this year of 2013, the only company that will be better, is IdeaMax. We are leaders of the industry, and are the best company in the business.

Our IdeaMax is a family oriented, it is for parents, the children, and their products are designed to serve and protect the public with the available to the market.

CREATE A VISION ON YOUR LAPTOP OR DESKTOP THAT WILL BE SHINING AND VIBRANT

EXHIBIT

EXHIBIT

A-3

3-q

"BEFORE"

13

microclean
microclean max
micropad
e-wallet
r-guard
microstand
microstand desk
e-stylus
e-stylus microclean
microcloth
non-slip dash pad
iphone skin
custom card &
packaging
shipping &
production
template file
downloads

New Home Page

AFTER

EXHIBIT C

Microclean - Microfiber Screen Cleaners

https://www.facebook.com/MicrocleanUSA/info

Microclean - Microfiber Screen Cleaners by Ideamax

About

About

Visit our website to view our full product line, pricing, and order information.

Mission

Our mission at Ideamax is to provide our clients with the maximum potential for exposure in a technologically advanced world. Our full line of promotional products have been designed to capture and express the true essence of our clients' companies and to get their business name out there to the public.

Company Overview

In a world where advertisement is prominent in all realms of society, there are few marketing strategies that can catch the attention of the public eye. Our mission at Ideamax is to provide our clients with the maximum potential for exposure in a technologically advanced world. Ultimately, we employ key marketing strategies in an evolutionary business sense. Our products will take your company logo and advance it into quality brand name marketing. Make your vision come to life! Create a custom imprint of your logo and/or company information using full color digital processing in the highest print quality. Our materials are of the most premium grade and our production methods have been revised and enhanced through years of development.

Get your company name out there and make your first impression a lasting impression!

Description

At Ideamax, we strive to promote your business to the next level with our new line Microclean products. Ideamax holds the official product patent on Microclean - Microfiber Screen Cleaners. These revolutionary products provide your business with a new effective way to market. We produce only the highest quality promotional products that are multi-functional and portable.

Our microfiber screen cleaners are both easy to use and effective. Simply adhere to any surface on your mobile device, laptop, or tablet when not in use. Our patented Magic adhesive gel is one of a kind and is able to withstand thousands of re-applications!

General Information

Ideamax

Hours of Operation: Monday-Friday, 8AM-5PM PST

Address: 16 Technology Drive, Suite 127, Irvine, CA 92618

Phone: (949) 754-0960
Fax: (949) 754-0961

ideamax@ampm.net (General Email)
chrgess.Ideamax@gmail.com (Customer Service)

About Create Ad Create Page Developers Careers Privacy Cookies Terms Help

Facebook © 2013 English (US)

Basic Info

Founded: 1997
Created: 2003

Contact Info

Website: <http://www.microclean.net>

MicroClean Facebook page
Info section



2. Chat (off)

"BEFORE"

Microclean- Microfiber Scr... | [About](#)

About

Visit our website to view our full product line, pricing, and order information.

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Description

At Ideamax we strive to promote your business to the next level with our Microclean and related products. These revolutionary products provide your business with a new affective way to market. We produce only the highest quality promotional products that are multi-functional and portable. Our microfiber screen cleaners are both easy to use and effective. Simply adhere to any surface on your mobile device, laptop, or tablet when not in use. Our patented Magentic adhesive gel is one of a kind and is able to withstand thousands of re-applications!

General Information

Ideamax

Hours of Operation:
Monday-Friday, 8AM-5PM PST
[... See More](#)

Basic Info

Founded	1997
Release Date	2003
Products	Microclean microfiber electronic screen cleaners, MicroPad, MicroStand Desk, Iphone Stand, and MicroStand

Contact Info

Website: <http://www.microclean.net>

[Settings](#) | [Logout](#)

[Ads Manager](#)

See Your Ad Here

Microclean-
Microfiber Screen
Cleaners by Ideamax



Visit our website to view our full product line, pricing, and order information.

[Like](#) [Like this](#)

[Advertise your page](#)

[About](#) | [Create Ad](#) | [Create Page](#) | [Developers](#) | [Careers](#) | [Privacy](#) | [Cookies](#) | [Terms](#) | [Help](#)

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EXHIBIT D

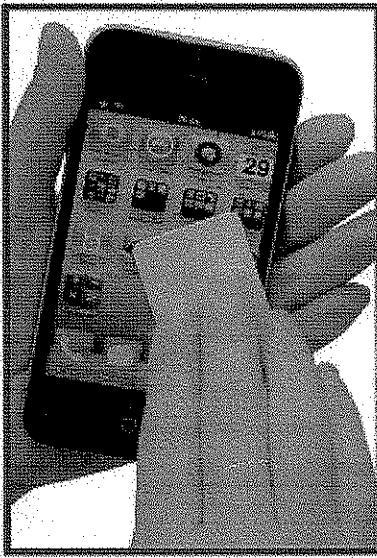
NEW SIZES & SHAPES!

MicroClean®

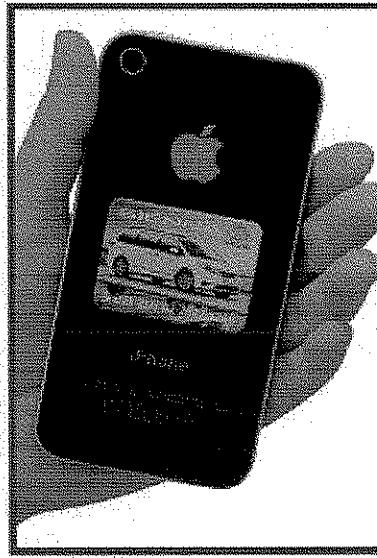
Portable Microfiber Adhesive Screen Cleaner for
Smart Phones, iPhones, Glasses, Cameras, etc.



PEEL



WIPE



STICK

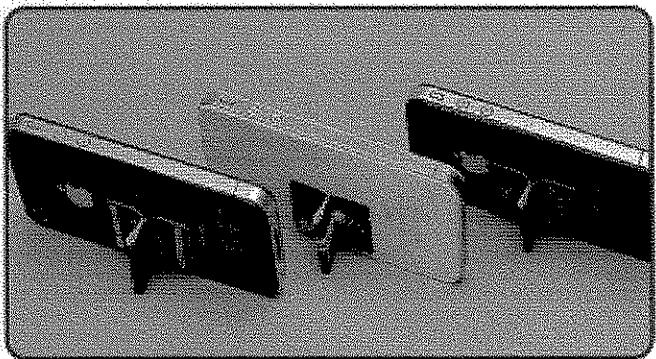
Use it on the go wherever your MOBILE device may take you!

FEATURES

- Great portable screen cleaner for smart phones, portable devices, glasses, iPods, camera lenses, etc.
- Ultra-fine Microfiber material removes fingerprints, dirt, dust & makeup from screens in one swipe!
- Self-adheres anywhere on the back of your device or device case when not in use, making it extremely portable!
- New US Patented Magstic adhesive gel adheres to matte finished phones, devices and cases!
- Provides shock absorption when adhered to device
- Fully customizable product and packaging to best suite your business marketing needs, target markets, and trends!
- Carefully developed for over ten years and genuinely US Patented, the revolutionary Magstic adhesive gel is washable, thus enabling each MicroClean to be reusable thousands of times!
- Ultra-fine microfiber material is guaranteed not to scratch any of the recommended cleaning surfaces
- If the Magstic adhesive gel gets dusty or dirty, simply wipe it with a wet towel and the MicroClean will stick and appear like new!
- Our high frequency heat sealing and advanced production methods prevent MicroCleans from fraying and guarantee the highest durable product available on the market!

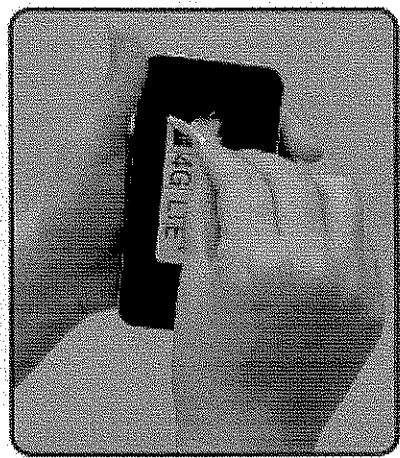
MICROSTAND

Portable Smart Phone Stand & Microfiber Screen Cleaner

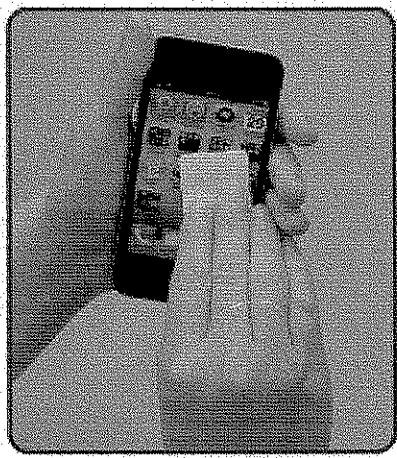


Perfect for easily watching movies & playing games while on the go!

In two simple steps your smart phone becomes free standing!



PEEL



CLEAN



STICK

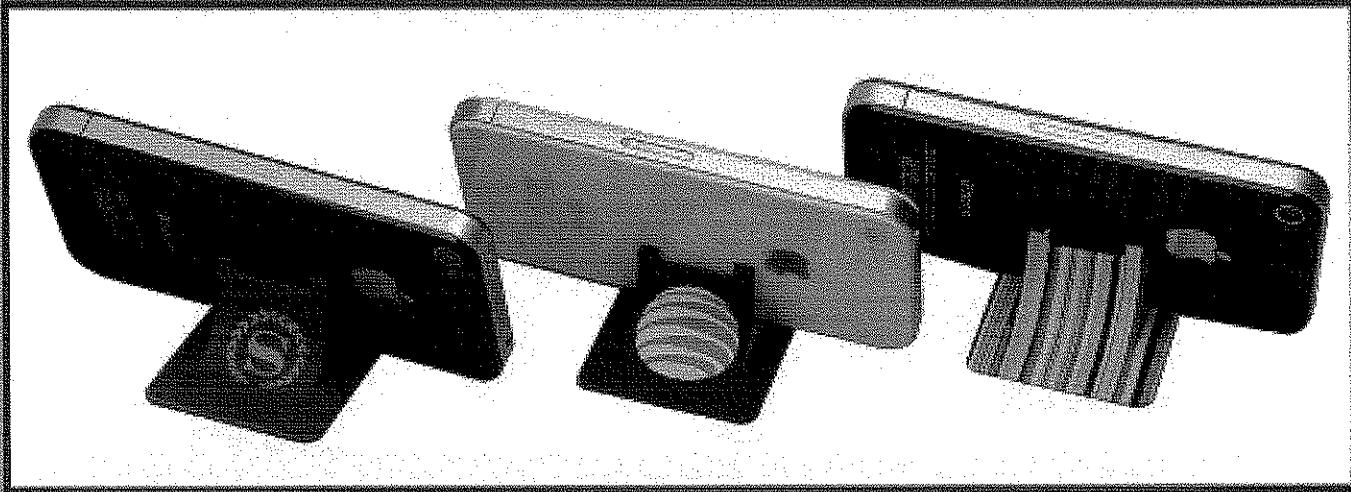
FEATURES

- Great portable stand for smart phones and hand-held devices of all types!
- Ultra-fine Microfiber material removes fingerprints, dirt & dust from screens in one swipe!
- Self-adheres anywhere on the back of your device or device case when not in use, making it extremely portable!
- New US Patented Magstic gel adhesive adheres to matte finished devices and cases!
- Provides shock absorption when adhered to device
- Fully customizable product and packaging to best suite your business marketing needs, target markets, and trends!
- Carefully developed for over ten years and genuinely US Patented, the revolutionary Magstic adhesive gel is washable, thus enabling each MicroStand to be reusable thousands of times!
- Ultra-fine microfiber material is guaranteed not to scratch any of the recommended cleaning surfaces
- If the Magstic adhesive gel gets dusty or dirty, simply wipe it with a wet towel and the MicroStand will stick and appear like new!
- Our high frequency heat sealing and advanced production methods prevent MicroStands from fraying and guarantee the highest durable product available on the market!

MicroStand Desk

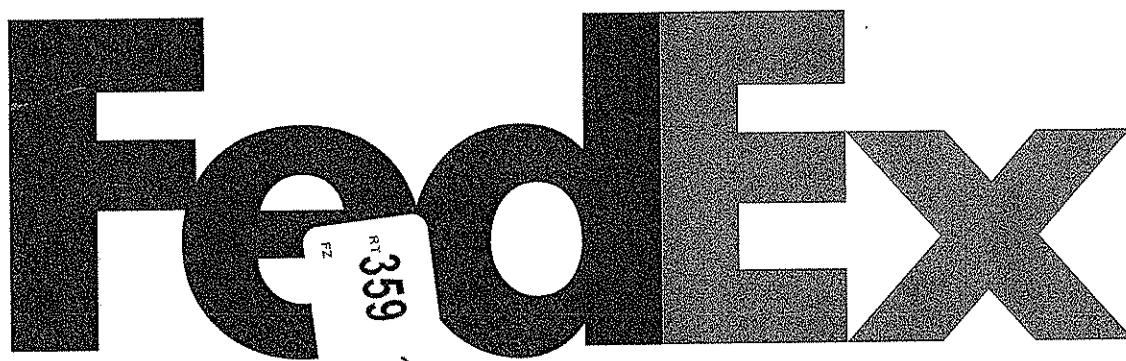
Portable Smart Phone/Device Stand & Microfiber Screen Cleaner

The perfect portable stand that goes wherever your mobile device may take you!



FEATURES

- Great portable stand for smart phones and hand-held devices of all types!
- Ultra-fine Microfiber material removes fingerprints, dirt & dust from screens in one swipe!
- Self-adheres anywhere on the back of your device or device case when not in use, making it extremely portable!
- New US Patented Magstic gel adhesive adheres to matte finished devices and cases!
- Provides shock absorption when adhered to device
- Fully customizable product and packaging to best suite your business marketing needs, target markets, and trends!
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- Ultra-fine microfiber material is guaranteed not to scratch any of the recommended cleaning surfaces
- If the Magstic adhesive gel gets dusty or dirty, simply wipe it with a wet towel and the MicroStand will stick and appear like new!
- Our high frequency heat sealing and advanced production methods prevent MicroStands from fraying and guarantee the highest durable product available on the market!



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Express

SHIP TO: (800) 240-7240
ATTN: Clerk of Court
US District Court
501 W. 10TH Street Room 301
Northern Dist. of TX
FORT WORTH, TX 76102

From: (800) 754-0980
DEMAX
16 Technology Dr. #1127
Irving, CA 92318

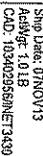
Origin ID: NZIA



FedEx
Express

Ship Date: 07NOV13
Assy#: 01B
CAD: 03402255mNET3430

Delivery Address Bar Code



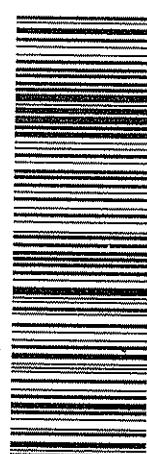
Ref#
Invoice#
PO#
Dept#

7971 1018 3314

FRI - 08 NOV 10:30A
PRIORITY OVERNIGHT

AD GLEA

76102
TX-US
DFW



CLERK OF COURT
2013 NOV - 8 AM 9:35
Align bottom of peel and stick airbill here.